REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 17-23 are pending in this application.

Objection to the Claims

Claims 16-23 were objected to because of various informalities. While claim 16

has been canceled, claim 17 has been rewritten in independent form including the

limitations of claim 16.

With respect to claim 16, line 15, Applicant respectfully submits that it is

explicitly clear that "the application program made in accordance with a required

specification (emphasis added)," refers to the application program, and not the PF

interface.

With respect to claim 16, line 20, the "required specification" is the same as the

previously cited "required specification." As noted above, the required specification

refers to the application program. The need that the coupling processing program

resolves is the need to mediate or bridge between the PF interface and the AP interface.

(see the language of claim 17 which now incorporates the previous language of now

canceled claim 16 stating "wherein the coupling processing program makes the computer

execute processing for a performing mediation...." See also page 6, lines 5-14 of the

originally-filed specification.

With respect to claim 16, line 22, the claim language has been editorially revised

to recite "wherein the application program makes the computer excute[s] the

processing...." Through this editorial amendment, it is clear that the computer executes the processing via the application program.

Accordingly, Applicant respectfully requests that the objection to the claims be withdrawn.

Objection to the Specification

The abstract was objected to because "there are references to the claims in the specification, for example on page 9, but some of the claims are no longer a part of the application or have been significantly amended and the discussion in the specification no longer corresponds." First, the reference to the claims on page 9 of the specification was deleted in the Amendment/Response filed June 24, 2005. In an abundance of caution, Applicant has provided a new abstract which corresponds to the currently pending claims. Applicant thus respectfully requests that the objection to the specification be withdrawn.

Rejection Under 35 U.S.C. §112

Claims 8, 21 and 23 were rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. In particular, the Office Action held that "In claim 18, it appears that the PF interface is being called a structure of data provided through the PF interface." Claim 18 has been editorially amended by adding commas as follows: "an object standardized, as the PF interface, is a structure of a data provided through the PF interface...." Accordingly, Applicant submits that the editorial amendments (i.e., the

addition of commas) clarifies that the PF interface is not being called a structure of data provided through the PF interface.

Claim 21 has been editorially revised to require "wherein the AP interface is constructed such that the data converted by the coupling processing program is referred to by the processing using the application program." This claim clearly recites that processing using the application program refers to converted data. The data is converted by the coupling processing program.

Accordingly, Applicant respectfully requests the rejection of claims 18, 21 and 23 under 35 U.S.C. §112, be withdrawn.

Rejection Under 35 U.S.C. §102

Claims 16-23 were rejected under 35 U.S.C. §102 as allegedly being anticipated by Sakai et al (U.S. '249, hereinafter "Sakai"). Applicant respectfully traverses this rejection with respect to still pending claims 17-23.

Anticipation under Section 102 of the Patent Act requires that a prior art reference disclose every claim element of the claimed invention. See, e.g., *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.,* 806 F.2d 1565, 1574 (Fed. Cir. 1986). Sakai fails to disclose every claim element of the claimed invention. For example, Sakai fails to disclose "the platform program makes the computer perform an inputting and storing operation at every first predetermined interval; and the coupling program makes the computer perform a converting and storing operation at every second predetermined interval, the

second predetermined interval being different from the first predetermined interval," as required by claim 17 (now rewritten in independent form) and its respective dependents.

Section 4 (page 5) of the Office Action states "As per the argument with respect to intervals, Sakai et al. discloses that the converted data can be outputted at any desired interval. The different intervals are functional language that the invention of the Sakai is <u>capable</u> of performing (emphasis added)."

Sakai clearly fails to disclose two different processing programs (the platform processing program and the coupling processing program) operating at different intervals. The general allegation that Sakai is "capable" of performing different intervals as claimed is clearly insufficient for a disclosure of this explicitly required claim limitation. The absence of any element of the claim from the cited reference negates anticipation. See, e.g., *Structural Rubber Prods. Co. v. Park Rubber Co.*, 749 F.2d 707, 715 (Fed. Cir. 1984). Anticipation is not shown even if the differences between the claims and the prior art reference are insubstantial and the missing elements could be supplied by the knowledge of one skilled in the art. See, e.g., *Structural Rubber Prods.*, 749 F.2d at 716-17.

Accordingly, even assuming arguendo that a reference might be "capable" of disclosing a particular claim limitation, this does not mean that the reference actually does disclose this claim limitation. Applicant therefore submits that Sakai fails to disclose every element of the claimed invention.

The above noted claim limitations are supported by, for example, Fig. 5B of the present application which illustrates the platform processing program 2 and the coupling processing program 3 performing operations at different intervals (1 ms and 16 ms).

Moreover, Sakai further fails to teach or suggest two different processing programs (platform and coupling processing programs) operating at different intervals and two different memory sections under management of these two different programs. By way of example, memory 13 in Fig. 1 of the present application includes a first section and a second section for storing first and second data under the management of the platform processing program 2 and the coupling processing program 3, respectively. The first section and the second section are independent from each other. Through these related features, an application program 4 (not related to hardware devices) can be modified easily without necessitating corresponding modifications of the platform processing program 2 (related to the hardware devices), because the application program 4 can use the second data stored in the second section (not managed by the platform program 2), not the first data in the first section (managed by the platform program 2). This is exemplified in Fig. 5B in comparison to Fig. 6, in which an application program AP must be modified taking into account the platform program PF.

In Sakai, a communication conversion part 200 converts data received by a driver unit 300 and stores it in a common memory 210 in a form user by application unit 100 (see column 7, lines 52-59). Each time the driver unit 300 receives data, the communication conversion unit 200 converts and stores (updates) it in common memory

210. There is no disclosure of two different programs (platform and coupling processing) operating at different intervals and two memory areas under management of these two different programs. Page 5 of the Office Action apparently alleges that column 10, lines 50-58 discloses the above limitations. However, this description merely means that an engine application software 110 writes data in a common memory. This is not related to driver unit 300 (platform program).
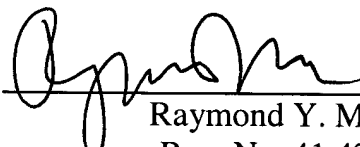
Accordingly, Applicant respectfully request that the rejection in view of Sakai be withdrawn.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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